

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

IN RE: PETITION TO IMPANEL A SPECIAL GRAND JURY Petitioner: Leo Burroughs	Misc. Case No. 20-mc-354
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GOVERNMENT’S RESPONSE

The United States of America, by and through its undersigned attorneys, hereby files this response to Petitioner Leo Burroughs Petition to Impanel a Special Grand Jury (ECF No. 1).

In his *pro se* filing, the Petitioner, an unsuccessful candidate for Baltimore City Council President in the June 2, 2020, Democratic primary, asks the Court to:

. . . authorize the impaneling of a Special Grand Jury to investigate the systemic policies, patterns, practices, and procedures of alleged misconduct arising ~ from the failures of the State of Md. and Baltimore City Boards of Election to fairly administer and perform their fiduciary responsibilities to the Electorate.

The Petitioner also asks the Court to:

... direct the U.S. Attorney for the District of Md., Robert K. Hur to investigate the following stipulated allegations of misconduct pursuant to a Special Grand Jury rendering a probable cause determination or finding of Civil/Voting Rights violations, Gross Negligence, Malfeasance, Non-Feasance, Criminal Acts of Voter Suppression, and/or No Bill,

The Petitioner then lists in his filing what he obviously believes are past and present instances of misdeeds in the conduct of local elections.

There are already multiple grand juries operating in this district that are capable of investigating allegations of election crimes. The Petitioner may be unaware of that fact. In any event, there is no justification to impanel an additional one provided in the Petitioner’s filing and undersigned counsel believes none exists.

The doctrine of separation of powers enriched in the U.S. Constitution makes the second type of relief the Petitioner seeks, namely that the Court “direct the U.S. Attorney for the District of Md.” to conduct an investigation, unavailable.

However, undersigned counsel urges the Petitioner to contact the Federal Bureau of Investigation at 410-265-8080 if he believes he has been the victim of a crime or has information related to the commission of any crime.

Respectfully submitted.

Robert K. Hur
United States Attorney

/s/ Leo J. Wise
Leo J. Wise
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing was sent by first class U.S. mail to the Petitioner.

/s/ Leo J. Wise
Leo J. Wise
Assistant United States Attorney